

# **EXHIBIT C**

**Subject:** Re: TQ Delta, LLC v. Commscope 2:21-cv-310-JRG / Request to Meet and Confer regarding Revised Docket Control and Discovery Order

**Date:** Friday, June 17, 2022 at 3:13:46 PM Mountain Daylight Time

**From:** Kent Dallow

**To:** Walsh, Rachel M., Edward Chin, Wroblewski, Karlee, Scott Stevens, Donald, Katie, Ken Chang, Dan Young, Tara Damhoff, Nokia309, Kline, Douglas J, Ong, Andrew

**CC:** TQDelta Listserv, Bo Davis, Christian Hurt

**Attachments:** DRAFT Ex. A Revised Discovery Order (Proposal A).docx, DRAFT Ex. A Revised Docket Control Order (Proposal A).docx, DRAFT Ex. B Revised Discovery Order (Proposal B).docx, DRAFT Ex. B Revised Docket Control Order (Proposal B).docx, image001.png, image002.png

Counsel,

Please find attached the revised proposal A and B's that we plan on filing with our opposed motions for amended docket control and discovery order next Wednesday. We have copied our understanding of the parties' positions on these matters below, please let us know if anything is incorrect.

Counsel for CommScope, we have modified the deadlines to accommodate for your requests around the holidays and with respect to discovery between Broadcom and CommScope, please let us know if you have any issues with these revisions.

In addition, counsel for CommScope, if you could please provide us with your basis for opposing a motion to sever as previously requested, we would appreciate it as well.

Lastly, counsel for TQ Delta, if you could please provide us with your revisions to the proposed protective order, we would appreciate it.

Best,

Kent

Discovery Order

Plaintiff TQ Delta, LLC ("TQ Delta") does not oppose this limitation [Broadcom's request that discovery involving Broadcom be limited to the sole claim directed at it for Indemnification] and Proposal A; Defendants CommScope Holding Company, Inc., CommScope Inc., ARRIS International Limited, ARRIS Global Ltd., ARRIS US Holdings Inc., ARRIS Solutions, Inc., ARRIS Technology, Inc., and ARRIS Enterprises, LLC ("CommScope") take no position on this limitation and Proposal A; and Defendants Nokia Corp., Nokia Solutions and Networks Oy, and Nokia of American Corp ("Nokia") oppose this limitation and Proposal A.

TQ Delta opposes Proposal B only to the extent it necessitates modifying the current Docket Control Order but otherwise does not oppose the discovery limitations set therein; and CommScope and

Nokia do not take a position.

Docket Control Order

Plaintiff TQ Delta, LLC ("TQ Delta") does not oppose this limitation [Broadcom's request that discovery involving Broadcom be limited to the sole claim directed at it for Indemnification] and Proposal A; Defendants CommScope Holding Company, Inc., CommScope Inc., ARRIS International Limited, ARRIS Global Ltd., ARRIS US Holdings Inc., ARRIS Solutions, Inc., ARRIS Technology, Inc., and ARRIS Enterprises, LLC ("CommScope") take no position on this limitation and Proposal A; and Defendants Nokia Corp., Nokia Solutions and Networks Oy, and Nokia of American Corp ("Nokia") oppose this limitation and Proposal A.

TQ Delta opposes Proposal B, whereas CommScope and Nokia do not take a position.

---

Kent Dallow  
Counsel  
**Adsero IP**  
8210 Southpark Terrace, Littleton, CO 80120  
**P** +1 303.268.0066 | **E** [KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)  
[www.AdseroIP.com](http://www.AdseroIP.com) | [my profile](#)



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**From:** Kent Dallow <[KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)>

**Date:** Tuesday, June 14, 2022 at 7:55 AM

**To:** Walsh, Rachel M. <[RWalsh@goodwinlaw.com](mailto:RWalsh@goodwinlaw.com)>, Edward Chin <[echin@davisfirm.com](mailto:echin@davisfirm.com)>, Wroblewski, Karlee <[Karlee.Wroblewski@alston.com](mailto:Karlee.Wroblewski@alston.com)>, Scott Stevens <[Scott.Stevens@alston.com](mailto:Scott.Stevens@alston.com)>, Donald, Katie <[Katie.Donald@alston.com](mailto:Katie.Donald@alston.com)>, Ken Chang <[Ken@AdseroIP.com](mailto:Ken@AdseroIP.com)>, Dan Young <[DYoung@AdseroIP.com](mailto:DYoung@AdseroIP.com)>, Tara Damhoff <[TDamhoff@AdseroIP.com](mailto:TDamhoff@AdseroIP.com)>, Nokia309 <[Nokia309@alston.com](mailto:Nokia309@alston.com)>, Kline, Douglas J <[DKline@goodwinlaw.com](mailto:DKline@goodwinlaw.com)>, Ong, Andrew <[AOng@goodwinlaw.com](mailto:AOng@goodwinlaw.com)>

**Cc:** TQDelta Listserv <[tqd@davisfirm.com](mailto:tqd@davisfirm.com)>, Bo Davis <[bdavis@davisfirm.com](mailto:bdavis@davisfirm.com)>, Christian Hurt <[churt@davisfirm.com](mailto:churt@davisfirm.com)>

**Subject:** Re: TQ Delta, LLC v. Commscope 2:21-cv-310-JRG / Request to Meet and Confer regarding Revised Docket Control and Discovery Order

Rachel,

Given your statement below that “though TQ Delta’s case against the Nokia defendants and its case against the CommScope defendants have been consolidated for pretrial issues, they remain separate cases,” can you please provide a basis for why CommScope opposes TQ Delta’s motion to sever?

Best,

Kent

---

Kent Dallow  
Counsel  
**Adsero IP**  
8210 Southpark Terrace, Littleton, CO 80120  
**P** +1 303.268.0066 | **E** [KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)  
[www.AdseroIP.com](http://www.AdseroIP.com) | [my profile](#)



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**From:** Walsh, Rachel M. <[RWalsh@goodwinlaw.com](mailto:RWalsh@goodwinlaw.com)>  
**Date:** Monday, June 13, 2022 at 10:47 PM  
**To:** Edward Chin <[echin@davisfirm.com](mailto:echin@davisfirm.com)>, Kent Dallow <[KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)>, Wroblewski, Karlee <[Karlee.Wroblewski@alston.com](mailto:Karlee.Wroblewski@alston.com)>, Scott Stevens <[Scott.Stevens@alston.com](mailto:Scott.Stevens@alston.com)>, Donald, Katie <[Katie.Donald@alston.com](mailto:Katie.Donald@alston.com)>, Ken Chang <[Ken@AdseroIP.com](mailto:Ken@AdseroIP.com)>, Dan Young <[DYoung@AdseroIP.com](mailto:DYoung@AdseroIP.com)>, Tara Damhoff <[TDamhoff@AdseroIP.com](mailto:TDamhoff@AdseroIP.com)>, Nokia309 <[Nokia309@alston.com](mailto:Nokia309@alston.com)>, Kline, Douglas J <[DKline@goodwinlaw.com](mailto:DKline@goodwinlaw.com)>, Ong, Andrew <[AOng@goodwinlaw.com](mailto:AOng@goodwinlaw.com)>  
**Cc:** TQDelta Listserv <[tqd@davisfirm.com](mailto:tqd@davisfirm.com)>, Bo Davis <[bdavis@davisfirm.com](mailto:bdavis@davisfirm.com)>, Christian Hurt <[churt@davisfirm.com](mailto:churt@davisfirm.com)>  
**Subject:** RE: TQ Delta, LLC v. Commscope 2:21-cv-310-JRG / Request to Meet and Confer regarding Revised Docket Control and Discovery Order

Ed,

To close the loop on this, CommScope will oppose TQ Delta’s motion to sever the Nokia-Broadcom issues.

Regards,

Rachel

---

**From:** Edward Chin <[echin@davisfirm.com](mailto:echin@davisfirm.com)>  
**Sent:** Monday, June 13, 2022 1:30 PM  
**To:** Kent Dallow <[KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)>; Walsh, Rachel M. <[RWalsh@goodwinlaw.com](mailto:RWalsh@goodwinlaw.com)>; Wroblewski, Karlee <[Karlee.Wroblewski@alston.com](mailto:Karlee.Wroblewski@alston.com)>; Scott Stevens <[Scott.Stevens@alston.com](mailto:Scott.Stevens@alston.com)>; Donald, Katie <[Katie.Donald@alston.com](mailto:Katie.Donald@alston.com)>; Ken Chang <[Ken@AdseroIP.com](mailto:Ken@AdseroIP.com)>; Dan Young <[DYoung@AdseroIP.com](mailto:DYoung@AdseroIP.com)>; Tara Damhoff <[TDamhoff@AdseroIP.com](mailto:TDamhoff@AdseroIP.com)>; Nokia309 <[Nokia309@alston.com](mailto:Nokia309@alston.com)>; Kline, Douglas J <[DKline@goodwinlaw.com](mailto:DKline@goodwinlaw.com)>

<DKline@goodwinlaw.com>; Ong, Andrew <AOng@goodwinlaw.com>

**Cc:** TQDelta Listserv <tqd@davisfirm.com>; Bo Davis <bdavis@davisfirm.com>; Christian Hurt <churt@davisfirm.com>

**Subject:** Re: TQ Delta, LLC v. Commscope 2:21-cv-310-JRG / Request to Meet and Confer regarding Revised Docket Control and Discovery Order

\*\*\*EXTERNAL\*\*\*

Counsel,

**Docket Control Order** - TQ Delta does not oppose “Proposal A” subject to the understanding that TQ Delta’s lack of opposition is not and should not be considered a waiver of its position that the trial of the indemnification issues between Nokia and Broadcom should not be tried within the same trial as the patent infringement issues between TQ Delta and Nokia.

TQ Delta opposes “Proposal B” primarily because it would move the trial date by four months. Also, the proposed new date to serve rebuttal expert reports is January 6, which does not seem workable as a practical matter because it would require the parties’ experts and counsel to work on the reports through the December holidays, which is highly likely to cause scheduling and availability problems.

TQ Delta believes that an option better than Proposals A or B is for the indemnification issues between Broadcom and Nokia to be severed into a separate case so that they can proceed on their own schedule, discovery limits, and trial date. A severance of the Nokia-Broadcom dispute would also address CommScope’s concern about being subject to party discovery propounded by CommScope under Proposal B.

**Discovery Order** - TQ Delta does not oppose “Proposal A” and “Proposal B.”

**Ed Chin, Of Counsel**

**The Davis Firm, P.C.**

213 N. Fredonia St., Suite 230

Longview, Texas 75601

office: 903-230-9090

[echin@davisfirm.com](mailto:echin@davisfirm.com)

On Jun 13, 2022, at 9:48 PM, Kent Dallow <[KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)> wrote:

Hello Rachel,

Thank you for CommScope’s positions. We will circulate updated drafts shortly reflecting both of your comments regarding the holidays and discovery between CommScope and Broadcom.

Best,

Kent

---

Kent Dallow  
Counsel  
**Adsero IP**  
8210 Southpark Terrace, Littleton, CO 80120  
**P** +1 303.268.0066 | **E** [KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)  
[www.AdseroIP.com](http://www.AdseroIP.com) | [my profile](#)

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**From:** Walsh, Rachel M. <[RWalsh@goodwinlaw.com](mailto:RWalsh@goodwinlaw.com)>  
**Date:** Friday, June 10, 2022 at 3:28 PM  
**To:** Kent Dallow <[KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)>, Wroblewski, Karlee <[Karlee.Wroblewski@alston.com](mailto:Karlee.Wroblewski@alston.com)>, Edward Chin <[echin@davisfirm.com](mailto:echin@davisfirm.com)>, Stevens, Scott <[Scott.Stevens@alston.com](mailto:Scott.Stevens@alston.com)>, Donald, Katie <[Katie.Donald@alston.com](mailto:Katie.Donald@alston.com)>  
**Cc:** Christian Hurt <[churt@davisfirm.com](mailto:churt@davisfirm.com)>, Bo Davis <[bdavis@davisfirm.com](mailto:bdavis@davisfirm.com)>, Ken Chang <[Ken@AdseroIP.com](mailto:Ken@AdseroIP.com)>, Dan Young <[DYoung@AdseroIP.com](mailto:DYoung@AdseroIP.com)>, Tara Damhoff <[TDamhoff@AdseroIP.com](mailto:TDamhoff@AdseroIP.com)>, Nokia309 <[Nokia309@alston.com](mailto:Nokia309@alston.com)>, Kline, Douglas J <[DKline@goodwinlaw.com](mailto:DKline@goodwinlaw.com)>, Ong, Andrew <[AOng@goodwinlaw.com](mailto:AOng@goodwinlaw.com)>  
**Subject:** RE: TQ Delta, LLC v. CommScope 2:21-cv-310-JRG / Request to Meet and Confer regarding Revised Docket Control and Discovery Order

Kent,

With respect to the docket control order, CommScope takes no position on “Option A,” which appears to consist of the current deadlines. For “Option B”, CommScope does not oppose, and is willing to discuss adjustments to dates for holidays, along the lines of the point raised by TQ Delta with respect to the deadline for rebuttal expert reports.

With respect to the proposed discovery order, CommScope takes no position on “Option A.”

With respect to Option B, it is worth noting that though TQ Delta's case against the Nokia defendants and its case against the CommScope defendants have been consolidated for pretrial issues, they remain separate cases. Because of this CommScope will oppose any attempts by Broadcom to propound party discovery against it under either proposal. If you have authority that would allow Broadcom to do so, we are willing to consider it, but as stated, CommScope objects to any attempt by Broadcom to propound party discovery on it as described in Option B, and takes no position on the discovery limitations as between Broadcom, Nokia, and TQ Delta in the -309 case.

We will revert to you next week on the protective order.

Regards,

Rachel

---

**From:** Kent Dallow <[KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)>  
**Sent:** Friday, June 10, 2022 11:01 AM  
**To:** Wroblewski, Karlee <[Karlee.Wroblewski@alston.com](mailto:Karlee.Wroblewski@alston.com)>; Edward Chin <[echin@davisfirm.com](mailto:echin@davisfirm.com)>; Walsh, Rachel M. <[RWalsh@goodwinlaw.com](mailto:RWalsh@goodwinlaw.com)>; Stevens, Scott <[Scott.Stevens@alston.com](mailto:Scott.Stevens@alston.com)>; Donald, Katie <[Katie.Donald@alston.com](mailto:Katie.Donald@alston.com)>  
**Cc:** Christian Hurt <[churt@davisfirm.com](mailto:churt@davisfirm.com)>; Bo Davis <[bdavis@davisfirm.com](mailto:bdavis@davisfirm.com)>; Ken Chang <[Ken@AdseroIP.com](mailto:Ken@AdseroIP.com)>; Dan Young <[DYoung@AdseroIP.com](mailto:DYoung@AdseroIP.com)>; Tara Damhoff <[TDamhoff@AdseroIP.com](mailto:TDamhoff@AdseroIP.com)>; Nokia309 <[Nokia309@alston.com](mailto:Nokia309@alston.com)>; Kline, Douglas J <[DKline@goodwinlaw.com](mailto:DKline@goodwinlaw.com)>; Ong, Andrew <[AOng@goodwinlaw.com](mailto:AOng@goodwinlaw.com)>  
**Subject:** Re: TQ Delta, LLC v. Commscope 2:21-cv-310-JRG / Request to Meet and Confer regarding Revised Docket Control and Discovery Order

\*\*\*EXTERNAL\*\*\*

Rachel and Ed,

I write to follow up on my email below, please let us know if we can expect to receive CommScope's and TQ Delta's positions by the end of the day today.

Best,

Kent

---  
Kent Dallow  
Counsel  
Adsero IP

8210 Southpark Terrace, Littleton, CO 80120  
**P** +1 303.268.0066 | **E** [KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)  
[www.AdseroIP.com](http://www.AdseroIP.com) | [my profile](#)

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**From:** Kent Dallow <[KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)>  
**Date:** Thursday, June 9, 2022 at 11:35 AM  
**To:** Wroblewski, Karlee <[Karlee.Wroblewski@alston.com](mailto:Karlee.Wroblewski@alston.com)>, Edward Chin <[echin@davisfirm.com](mailto:echin@davisfirm.com)>, Walsh, Rachel M. <[RWalsh@goodwinlaw.com](mailto:RWalsh@goodwinlaw.com)>, Stevens, Scott <[Scott.Stevens@alston.com](mailto:Scott.Stevens@alston.com)>, Donald, Katie <[Katie.Donald@alston.com](mailto:Katie.Donald@alston.com)>  
**Cc:** Christian Hurt <[churt@davisfirm.com](mailto:churt@davisfirm.com)>, Bo Davis <[bdavis@davisfirm.com](mailto:bdavis@davisfirm.com)>, Ken Chang <[Ken@AdseroIP.com](mailto:Ken@AdseroIP.com)>, Dan Young <[DYoung@AdseroIP.com](mailto:DYoung@AdseroIP.com)>, Tara Damhoff <[TDamhoff@AdseroIP.com](mailto:TDamhoff@AdseroIP.com)>, Nokia309 <[Nokia309@alston.com](mailto:Nokia309@alston.com)>, Kline, Douglas J <[DKline@goodwinlaw.com](mailto:DKline@goodwinlaw.com)>, Ong, Andrew <[AOng@goodwinlaw.com](mailto:AOng@goodwinlaw.com)>  
**Subject:** Re: TQ Delta, LLC v. Commscope 2:21-cv-310-JRG / Request to Meet and Confer regarding Revised Docket Control and Discovery Order

Karlee, thank you for the below redlines.

Rachel and Ed, as it is our goal to get the proposed docket control and discovery orders on file early next week, would it be possible to get CommScope and TQ Delta's positions by the end of the week? We can then follow up on the protective order issues thereafter.

Best,

Kent

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Kent Dallow  
Counsel  
**Adsero IP**  
8210 Southpark Terrace, Littleton, CO 80120  
**P** +1 303.268.0066 | **E** [KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)  
[www.AdseroIP.com](http://www.AdseroIP.com) | [my profile](#)

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**From:** Wroblewski, Karlee <[Karlee.Wroblewski@alston.com](mailto:Karlee.Wroblewski@alston.com)>  
**Date:** Wednesday, June 8, 2022 at 2:47 PM  
**To:** Kent Dallow <[KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)>, Edward Chin <[echin@davisfirm.com](mailto:echin@davisfirm.com)>, Walsh, Rachel M. <[RWalsh@goodwinlaw.com](mailto:RWalsh@goodwinlaw.com)>, Stevens, Scott <[Scott.Stevens@alston.com](mailto:Scott.Stevens@alston.com)>, Donald, Katie <[Katie.Donald@alston.com](mailto:Katie.Donald@alston.com)>  
**Cc:** Christian Hurt <[churt@davisfirm.com](mailto:churt@davisfirm.com)>, Bo Davis <[bdavis@davisfirm.com](mailto:bdavis@davisfirm.com)>, Ken Chang <[Ken@AdseroIP.com](mailto:Ken@AdseroIP.com)>, Dan Young <[DYoung@AdseroIP.com](mailto:DYoung@AdseroIP.com)>, Tara Damhoff <[TDamhoff@AdseroIP.com](mailto:TDamhoff@AdseroIP.com)>, Nokia309 <[Nokia309@alston.com](mailto:Nokia309@alston.com)>, Kline, Douglas J <[DKline@goodwinlaw.com](mailto:DKline@goodwinlaw.com)>, Ong, Andrew <[AOng@goodwinlaw.com](mailto:AOng@goodwinlaw.com)>  
**Subject:** RE: TQ Delta, LLC v. Commscope 2:21-cv-310-JRG / Request to Meet and Confer regarding Revised Docket Control and Discovery Order

Kent,

See below for redlines from Nokia. We are not of the position that all of Broadcom's proposals are reasonable and Broadcom does not have our permission to represent that to the Court.

Best,  
Karlee

**Karlee N. Wroblewski | Alston & Bird LLP**  
704.444.1299 office | 715.808.4562 mobile

---

**From:** Kent Dallow <[KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)>  
**Sent:** Wednesday, June 8, 2022 3:16 PM  
**To:** Edward Chin <[echin@davisfirm.com](mailto:echin@davisfirm.com)>; Walsh, Rachel M. <[RWalsh@goodwinlaw.com](mailto:RWalsh@goodwinlaw.com)>; Stevens, Scott <[Scott.Stevens@alston.com](mailto:Scott.Stevens@alston.com)>; Donald, Katie <[Katie.Donald@alston.com](mailto:Katie.Donald@alston.com)>  
**Cc:** Christian Hurt <[churt@davisfirm.com](mailto:churt@davisfirm.com)>; Bo Davis <[bdavis@davisfirm.com](mailto:bdavis@davisfirm.com)>; Ken Chang <[Ken@AdseroIP.com](mailto:Ken@AdseroIP.com)>; Dan Young <[DYoung@AdseroIP.com](mailto:DYoung@AdseroIP.com)>; Tara Damhoff <[TDamhoff@AdseroIP.com](mailto:TDamhoff@AdseroIP.com)>; Nokia309 <[Nokia309@alston.com](mailto:Nokia309@alston.com)>; Kline, Douglas J <[DKline@goodwinlaw.com](mailto:DKline@goodwinlaw.com)>; Ong, Andrew <[AOng@goodwinlaw.com](mailto:AOng@goodwinlaw.com)>  
**Subject:** Re: TQ Delta, LLC v. Commscope 2:21-cv-310-JRG / Request to Meet and Confer regarding Revised Docket Control and Discovery Order

**EXTERNAL SENDER – Proceed with caution**

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Counsel,

Thank you for your time on the call today. Below is a summary of our understanding of the parties' positions on the relevant documents we discussed. Please let us know if our

understanding is incorrect and we look forward to receiving the parties' respective edits and responses.

Best,

Kent

- Protective Order
  - CommScope's Position: CommScope will provide a redline with proposed revisions.
  - Nokia's Position: Nokia believes current protective order is adequate and opposes proposed revisions; will not provide a counter proposal at this time.
  - TQ Delta's Position: TQ Delta will provide a redline with proposed revisions.
- Discovery Order
  - CommScope's Position
    - A: No position at this time but will follow up with a response.
    - B: CommScope opposes discovery on CommScope by Broadcom and opposes proposal B.
  - Nokia's Position
    - A: Oppose.
    - B: **Believes that proposal is reasonable but take Nokia takes no position.**
  - TQ Delta's Position
    - A: TQ Delta is generally in agreement if everything is equal between the parties.
    - B: TQ Delta is generally in agreement if everything is equal between the parties.
- Docket Control Order
  - Broadcom's Position: Will need to revise initial proposed dates here, and will provide comments after receiving response from CommScope.
  - CommScope's Position
    - A: No position at this time but will follow up with a response.
    - B: CommScope does not oppose except for a few dates with respect to holidays.
  - Nokia's Position
    - A: Oppose.
    - B: **Believes that proposal is reasonable but take Nokia takes no position.**
  - TQ Delta's Position
    - A: Will provide a response in addition to proposal on motion to sever.
    - B: Oppose due to moving trial date.
- TQ Delta's Proposed Motion to Sever:
  - Broadcom's Position: Broadcom will provide a response.
  - CommScope's Position: CommScope will provide a response.
  - Nokia's Position: Opposes.

---

Kent Dallow  
Counsel  
**Adsero IP**  
8210 Southpark Terrace, Littleton, CO 80120  
**P** +1 303.268.0066 | **E** [KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)  
[www.AdseroIP.com](http://www.AdseroIP.com) | [my profile](#)

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**From:** Edward Chin <[echin@davisfirm.com](mailto:echin@davisfirm.com)>  
**Date:** Tuesday, June 7, 2022 at 10:38 AM  
**To:** Kent Dallow <[KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)>  
**Cc:** Walsh, Rachel M. <[RWalsh@goodwinlaw.com](mailto:RWalsh@goodwinlaw.com)>, Donald, Katie <[Katie.Donald@alston.com](mailto:Katie.Donald@alston.com)>, Christian Hurt <[churt@davisfirm.com](mailto:churt@davisfirm.com)>, Bo Davis <[bdavis@davisfirm.com](mailto:bdavis@davisfirm.com)>, Ken Chang <[Ken@AdseroIP.com](mailto:Ken@AdseroIP.com)>, Dan Young <[DYoung@AdseroIP.com](mailto:DYoung@AdseroIP.com)>, Tara Damhoff <[TDamhoff@AdseroIP.com](mailto:TDamhoff@AdseroIP.com)>, Nokia309 <[Nokia309@alston.com](mailto:Nokia309@alston.com)>, Kline, Douglas J <[DKline@goodwinlaw.com](mailto:DKline@goodwinlaw.com)>, Ong, Andrew <[AOng@goodwinlaw.com](mailto:AOng@goodwinlaw.com)>  
**Subject:** Re: TQ Delta, LLC v. Commscope 2:21-cv-310-JRG / Request to Meet and Confer regarding Revised Docket Control and Discovery Order

Kent,

TQ Delta is available on Wednesday at 1:00pm Central. Please send a dial-in so it can get calendared promptly and to avoid intervening conflicts.

**Ed Chin, Of Counsel**  
**The Davis Firm, P.C.**  
213 N. Fredonia St., Suite 230  
Longview, Texas 75601  
office: 903-230-9090  
[echin@davisfirm.com](mailto:echin@davisfirm.com)

On Jun 7, 2022, at 9:52 AM, Kent Dallow <[KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)> wrote:

Ed, Christian, and Bo,

Please provide us with your availability for a call today, tomorrow, and Thursday from 1:30 ET to 2:30 ET. Given that we previously rescheduled this meet and confer twice because of your scheduling issues, we would appreciate a prompt response.

Best,

Kent

---

Kent Dallow  
Counsel  
**Adsero IP**  
8210 Southpark Terrace, Littleton, CO 80120  
**P** +1 303.268.0066 | **E** [KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)  
[www.AdseroIP.com](http://www.AdseroIP.com) | [my profile](#)

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**From:** Kent Dallow <[KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)>  
**Date:** Monday, June 6, 2022 at 6:56 PM  
**To:** Walsh, Rachel M. <[RWalsh@goodwinlaw.com](mailto:RWalsh@goodwinlaw.com)>, Donald, Katie <[Katie.Donald@alston.com](mailto:Katie.Donald@alston.com)>, Edward Chin <[echin@davisfirm.com](mailto:echin@davisfirm.com)>, Christian Hurt <[churt@davisfirm.com](mailto:churt@davisfirm.com)>  
**Cc:** Bo Davis <[bdavis@davisfirm.com](mailto:bdavis@davisfirm.com)>, Ken Chang <[Ken@AdseroIP.com](mailto:Ken@AdseroIP.com)>, Dan Young <[DYoung@AdseroIP.com](mailto:DYoung@AdseroIP.com)>, Tara Damhoff <[TDamhoff@AdseroIP.com](mailto:TDamhoff@AdseroIP.com)>, Nokia309 <[Nokia309@alston.com](mailto:Nokia309@alston.com)>, Kline, Douglas J <[DKline@goodwinlaw.com](mailto:DKline@goodwinlaw.com)>, Ong, Andrew <[AOng@goodwinlaw.com](mailto:AOng@goodwinlaw.com)>  
**Subject:** Re: TQ Delta, LLC v. Commscope 2:21-cv-310-JRG / Request to Meet and Confer regarding Revised Docket Control and Discovery Order

Thank you, Rachel.

Counsel for TQ Delta, can you please provide your availability?

---

Kent Dallow  
Counsel  
**Adsero IP**  
8210 Southpark Terrace, Littleton, CO 80120  
P +1 303.268.0066 | E [KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)  
[www.AdseroIP.com](http://www.AdseroIP.com) | [my profile](#)

<image006.png>

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---

**From:** Walsh, Rachel M. <[RWalsh@goodwinlaw.com](mailto:RWalsh@goodwinlaw.com)>  
**Date:** Monday, June 6, 2022 at 5:37 PM  
**To:** Kent Dallow <[KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)>, Donald, Katie <[Katie.Donald@alston.com](mailto:Katie.Donald@alston.com)>, Edward Chin <[echin@davisfirm.com](mailto:echin@davisfirm.com)>  
**Cc:** Bo Davis <[bdavis@davisfirm.com](mailto:bdavis@davisfirm.com)>, Ken Chang <[Ken@AdseroIP.com](mailto:Ken@AdseroIP.com)>, Dan Young <[DYoung@AdseroIP.com](mailto:DYoung@AdseroIP.com)>, Tara Damhoff <[TDamhoff@AdseroIP.com](mailto:TDamhoff@AdseroIP.com)>, Nokia309 <[Nokia309@alston.com](mailto:Nokia309@alston.com)>, Kline, Douglas J <[DKline@goodwinlaw.com](mailto:DKline@goodwinlaw.com)>, Ong, Andrew <[AOng@goodwinlaw.com](mailto:AOng@goodwinlaw.com)>  
**Subject:** RE: TQ Delta, LLC v. Commscope 2:21-cv-310-JRG / Request to Meet and Confer regarding Revised Docket Control and Discovery Order

Kent,

Of those times that Katie sent around, we can do Tuesday and Wednesday, and Thursday until 2:30 et.

Rachel

---

**From:** Kent Dallow <[KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)>  
**Sent:** Monday, June 6, 2022 2:48 PM

**To:** Donald, Katie <[Katie.Donald@alston.com](mailto:Katie.Donald@alston.com)>; Walsh, Rachel M. <[RWalsh@goodwinlaw.com](mailto:RWalsh@goodwinlaw.com)>; Edward Chin <[echin@davisfirm.com](mailto:echin@davisfirm.com)>  
**Cc:** Bo Davis <[bdavis@davisfirm.com](mailto:bdavis@davisfirm.com)>; Ken Chang <[Ken@AdseroIP.com](mailto:Ken@AdseroIP.com)>; Dan Young <[DYoung@AdseroIP.com](mailto:DYoung@AdseroIP.com)>; Tara Damhoff <[TDamhoff@AdseroIP.com](mailto:TDamhoff@AdseroIP.com)>; Nokia309 <[Nokia309@alston.com](mailto:Nokia309@alston.com)>; Kline, Douglas J <[DKline@goodwinlaw.com](mailto:DKline@goodwinlaw.com)>; Ong, Andrew <[AOng@goodwinlaw.com](mailto:AOng@goodwinlaw.com)>  
**Subject:** Re: TQ Delta, LLC v. Commscope 2:21-cv-310-JRG / Request to Meet and Confer regarding Revised Docket Control and Discovery Order

\*\*\*EXTERNAL\*\*\*

Thank you, Katie.

Counsel for CommScope and TQ Delta, please provide us with your availability.

Best,

Kent

---

Kent Dallow  
Counsel  
**Adsero IP**  
8210 Southpark Terrace, Littleton, CO 80120  
 +1 303.268.0066 | [KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)  
[www.AdseroIP.com](http://www.AdseroIP.com) | [my profile](#)

<image001.png>

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---

**From:** Donald, Katie <[Katie.Donald@alston.com](mailto:Katie.Donald@alston.com)>  
**Date:** Monday, June 6, 2022 at 2:40 PM  
**To:** Kent Dallow <[KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)>, Walsh, Rachel M. <[RWalsh@goodwinlaw.com](mailto:RWalsh@goodwinlaw.com)>, Edward Chin <[echin@davisfirm.com](mailto:echin@davisfirm.com)>  
**Cc:** Bo Davis <[bdavis@davisfirm.com](mailto:bdavis@davisfirm.com)>, Ken Chang <[Ken@AdseroIP.com](mailto:Ken@AdseroIP.com)>, Dan Young <[DYoung@AdseroIP.com](mailto:DYoung@AdseroIP.com)>, Tara Damhoff <[TDamhoff@AdseroIP.com](mailto:TDamhoff@AdseroIP.com)>, Nokia309 <[Nokia309@alston.com](mailto:Nokia309@alston.com)>, Kline, Douglas J <[DKline@goodwinlaw.com](mailto:DKline@goodwinlaw.com)>, Ong, Andrew <[AOng@goodwinlaw.com](mailto:AOng@goodwinlaw.com)>  
**Subject:** RE: TQ Delta, LLC v. Commscope 2:21-cv-310-JRG / Request to Meet and Confer regarding Revised Docket Control and Discovery Order

Kent,

Nokia is available between 1:30 and 3:30 ET on Tuesday, Wednesday, and Thursday.

Thanks,

Katie Donald  
Associate  
**Alston & Bird LLP**  
404-881-4630  
[Katie.donald@alston.com](mailto:Katie.donald@alston.com)

---

**From:** Kent Dallow <[KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)>  
**Sent:** Monday, June 6, 2022 3:59 PM  
**To:** Walsh, Rachel M. <[RWalsh@goodwinlaw.com](mailto:RWalsh@goodwinlaw.com)>; Donald, Katie <[Katie.Donald@alston.com](mailto:Katie.Donald@alston.com)>; Edward Chin <[echin@davisfirm.com](mailto:echin@davisfirm.com)>  
**Cc:** Bo Davis <[bdavis@davisfirm.com](mailto:bdavis@davisfirm.com)>; Ken Chang <[Ken@AdseroIP.com](mailto:Ken@AdseroIP.com)>; Dan Young <[DYoung@AdseroIP.com](mailto:DYoung@AdseroIP.com)>; Tara Damhoff <[TDamhoff@AdseroIP.com](mailto:TDamhoff@AdseroIP.com)>; Nokia309 <[Nokia309@alston.com](mailto:Nokia309@alston.com)>; Kline, Douglas J <[DKline@goodwinlaw.com](mailto:DKline@goodwinlaw.com)>; Ong, Andrew <[AOng@goodwinlaw.com](mailto:AOng@goodwinlaw.com)>  
**Subject:** Re: TQ Delta, LLC v. Commscope 2:21-cv-310-JRG / Request to Meet and Confer regarding Revised Docket Control and Discovery Order

**EXTERNAL SENDER – Proceed with caution**

---

Counsel,

Given the need to reschedule due to TQ Delta's counsel's availability, can you please let us know when all of the parties are available to discuss the proposed revised docket control and discovery order this week?

Best,

Kent

---  
Kent Dallow  
Counsel  
**Adsero IP**  
8210 Southpark Terrace, Littleton, CO 80120

P +1 303.268.0066 | E [KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)  
[www.AdseroIP.com](http://www.AdseroIP.com) | [my profile](#)

<image002.png>

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---

**From:** Kent Dallow <[KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)>  
**Date:** Monday, June 6, 2022 at 12:02 PM  
**To:** Walsh, Rachel M. <[RWalsh@goodwinlaw.com](mailto:RWalsh@goodwinlaw.com)>, Donald, Katie <[Katie.Donald@alston.com](mailto:Katie.Donald@alston.com)>, Edward Chin <[echin@davisfirm.com](mailto:echin@davisfirm.com)>  
**Cc:** Bo Davis <[bdavis@davisfirm.com](mailto:bdavis@davisfirm.com)>, Ken Chang <[Ken@AdseroIP.com](mailto:Ken@AdseroIP.com)>, Dan Young <[DYoung@AdseroIP.com](mailto:DYoung@AdseroIP.com)>, Tara Damhoff <[TDamhoff@AdseroIP.com](mailto:TDamhoff@AdseroIP.com)>, Nokia309 <[Nokia309@alston.com](mailto:Nokia309@alston.com)>, Kline, Douglas J <[DKline@goodwinlaw.com](mailto:DKline@goodwinlaw.com)>, Ong, Andrew <[AOng@goodwinlaw.com](mailto:AOng@goodwinlaw.com)>  
**Subject:** Re: TQ Delta, LLC v. Commscope 2:21-cv-310-JRG / Request to Meet and Confer regarding Revised Docket Control and Discovery Order

Counsel,

TQ Delta's counsel has not confirmed they are available for the call so it appears that we will need to reschedule. Please let me know your availability the remaining days this week.

Best,

Kent

---

Kent Dallow  
Counsel  
**Adsero IP**  
8210 Southpark Terrace, Littleton, CO 80120  
P +1 303.268.0066 | E [KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)  
[www.AdseroIP.com](http://www.AdseroIP.com) | [my profile](#)

<image003.png>

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**From:** Walsh, Rachel M. <[RWalsh@goodwinlaw.com](mailto:RWalsh@goodwinlaw.com)>  
**Date:** Monday, June 6, 2022 at 12:00 PM  
**To:** Donald, Katie <[Katie.Donald@alston.com](mailto:Katie.Donald@alston.com)>, Kent Dallow <[KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)>, Edward Chin <[echin@davisfirm.com](mailto:echin@davisfirm.com)>  
**Cc:** Bo Davis <[bdavis@davisfirm.com](mailto:bdavis@davisfirm.com)>, Ken Chang <[Ken@AdseroIP.com](mailto:Ken@AdseroIP.com)>, Dan Young <[DYoung@AdseroIP.com](mailto:DYoung@AdseroIP.com)>, Tara Damhoff <[TDamhoff@AdseroIP.com](mailto:TDamhoff@AdseroIP.com)>, Nokia309 <[Nokia309@alston.com](mailto:Nokia309@alston.com)>, Kline, Douglas J <[DKline@goodwinlaw.com](mailto:DKline@goodwinlaw.com)>, Ong, Andrew <[AOng@goodwinlaw.com](mailto:AOng@goodwinlaw.com)>  
**Subject:** RE: TQ Delta, LLC v. Commscope 2:21-cv-310-JRG / Request to Meet and Confer regarding Revised Docket Control and Discovery Order

Kent,

Do we have a dial-in for this call?

Rachel

---

**From:** Donald, Katie <[Katie.Donald@alston.com](mailto:Katie.Donald@alston.com)>  
**Sent:** Monday, June 6, 2022 10:28 AM  
**To:** Kent Dallow <[KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)>; Walsh, Rachel M. <[RWalsh@goodwinlaw.com](mailto:RWalsh@goodwinlaw.com)>; Edward Chin <[echin@davisfirm.com](mailto:echin@davisfirm.com)>  
**Cc:** Bo Davis <[bdavis@davisfirm.com](mailto:bdavis@davisfirm.com)>; Ken Chang <[Ken@AdseroIP.com](mailto:Ken@AdseroIP.com)>; Dan Young <[DYoung@AdseroIP.com](mailto:DYoung@AdseroIP.com)>; Tara Damhoff <[TDamhoff@AdseroIP.com](mailto:TDamhoff@AdseroIP.com)>; Nokia309 <[Nokia309@alston.com](mailto:Nokia309@alston.com)>; Kline, Douglas J <[DKline@goodwinlaw.com](mailto:DKline@goodwinlaw.com)>; Ong, Andrew <[AOng@goodwinlaw.com](mailto:AOng@goodwinlaw.com)>  
**Subject:** RE: TQ Delta, LLC v. Commscope 2:21-cv-310-JRG / Request to Meet and Confer regarding Revised Docket Control and Discovery Order

\*\*\*EXTERNAL\*\*\*

Kent,

The below time works for our team.

Thanks,

Katie Donald  
Associate  
**Alston & Bird LLP**  
404-881-4630  
[Katie.donald@alston.com](mailto:Katie.donald@alston.com)

---

**From:** Kent Dallow <[KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)>  
**Sent:** Monday, June 6, 2022 1:12 PM  
**To:** Walsh, Rachel M. <[RWalsh@goodwinlaw.com](mailto:RWalsh@goodwinlaw.com)>; Donald, Katie <[Katie.Donald@alston.com](mailto:Katie.Donald@alston.com)>; Edward Chin <[echin@davisfirm.com](mailto:echin@davisfirm.com)>  
**Cc:** Bo Davis <[bdavis@davisfirm.com](mailto:bdavis@davisfirm.com)>; Ken Chang <[Ken@AdseroIP.com](mailto:Ken@AdseroIP.com)>; Dan Young <[DYoung@AdseroIP.com](mailto:DYoung@AdseroIP.com)>; Tara Damhoff <[TDamhoff@AdseroIP.com](mailto:TDamhoff@AdseroIP.com)>; Nokia309 <[Nokia309@alston.com](mailto:Nokia309@alston.com)>; Kline, Douglas J <[DKline@goodwinlaw.com](mailto:DKline@goodwinlaw.com)>; Ong, Andrew <[AOng@goodwinlaw.com](mailto:AOng@goodwinlaw.com)>  
**Subject:** Re: TQ Delta, LLC v. Commscope 2:21-cv-310-JRG / Request to Meet and Confer regarding Revised Docket Control and Discovery Order

**EXTERNAL SENDER – Proceed with caution**

---

Ed and Katie,

Please confirm you are available at 11:00 AM PT / 12:00 PM MT / 2:00 PM ET to discuss. If not, please provide your availability for the rest of the week.

Best,

Kent

---

Kent Dallow  
Counsel  
**Adsero IP**  
8210 Southpark Terrace, Littleton, CO 80120  
**P** +1 303.268.0066 | **E** [KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)  
[www.AdseroIP.com](http://www.AdseroIP.com) | [my profile](#)

<image004.png>

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---

**From:** Walsh, Rachel M. <[RWalsh@goodwinlaw.com](mailto:RWalsh@goodwinlaw.com)>  
**Date:** Monday, June 6, 2022 at 10:46 AM  
**To:** Kent Dallow <[KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)>, Donald, Katie <[Katie.Donald@alston.com](mailto:Katie.Donald@alston.com)>, Edward Chin <[echin@davisfirm.com](mailto:echin@davisfirm.com)>  
**Cc:** Bo Davis <[bdavis@davisfirm.com](mailto:bdavis@davisfirm.com)>, Ken Chang <[Ken@AdseroIP.com](mailto:Ken@AdseroIP.com)>, Dan Young <[DYoung@AdseroIP.com](mailto:DYoung@AdseroIP.com)>, Tara Damhoff <[TDamhoff@AdseroIP.com](mailto:TDamhoff@AdseroIP.com)>, Nokia309 <[Nokia309@alston.com](mailto:Nokia309@alston.com)>, Kline, Douglas J <[DKline@goodwinlaw.com](mailto:DKline@goodwinlaw.com)>, Ong, Andrew <[AOng@goodwinlaw.com](mailto:AOng@goodwinlaw.com)>  
**Subject:** RE: TQ Delta, LLC v. Commscope 2:21-cv-310-JRG / Request to Meet and Confer regarding Revised Docket Control and Discovery Order

Kent,

We are available from 10 am pacific until noon. Apologies for the late notice.

Rachel

---

**From:** Kent Dallow <[KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)>

**Sent:** Monday, June 6, 2022 7:36 AM

**To:** Donald, Katie <[Katie.Donald@alston.com](mailto:Katie.Donald@alston.com)>; Edward Chin <[echin@davisfirm.com](mailto:echin@davisfirm.com)>

**Cc:** Walsh, Rachel M. <[RWalsh@goodwinlaw.com](mailto:RWalsh@goodwinlaw.com)>; Bo Davis <[bdavis@davisfirm.com](mailto:bdavis@davisfirm.com)>; Ken Chang <[Ken@AdseroIP.com](mailto:Ken@AdseroIP.com)>; Dan Young <[DYoung@AdseroIP.com](mailto:DYoung@AdseroIP.com)>; Tara Damhoff <[TDamhoff@AdseroIP.com](mailto:TDamhoff@AdseroIP.com)>; Nokia309 <[Nokia309@alston.com](mailto:Nokia309@alston.com)>; Kline, Douglas J <[DKline@goodwinlaw.com](mailto:DKline@goodwinlaw.com)>; Ong, Andrew <[AOng@goodwinlaw.com](mailto:AOng@goodwinlaw.com)>

**Subject:** Re: TQ Delta, LLC v. Commscope 2:21-cv-310-JRG / Request to Meet and Confer regarding Revised Docket Control and Discovery Order

**Importance:** High

\*\*\*EXTERNAL\*\*\*

Rachel,

Please let us know if Commscope is available today between 12:30 PM ET and 3 PM ET, otherwise, please let us know your availability for the rest of the week.

Best,

Kent

---

Kent Dallow  
Counsel  
**Adsero IP**  
8210 Southpark Terrace, Littleton, CO 80120  
**P** +1 303.268.0066 | **E** [KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)  
[www.AdseroIP.com](http://www.AdseroIP.com) | [my profile](#)

<image005.png>

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**From:** Donald, Katie <[Katie.Donald@alston.com](mailto:Katie.Donald@alston.com)>  
**Date:** Tuesday, May 31, 2022 at 11:08 AM  
**To:** Edward Chin <[echin@davisfirm.com](mailto:echin@davisfirm.com)>, Kent Dallow <[KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)>  
**Cc:** Walsh, Rachel M. <[RWalsh@goodwinlaw.com](mailto:RWalsh@goodwinlaw.com)>, Bo Davis <[bdavis@davisfirm.com](mailto:bdavis@davisfirm.com)>, Ken Chang <[Ken@AdseroIP.com](mailto:Ken@AdseroIP.com)>, Dan Young <[DYoung@AdseroIP.com](mailto:DYoung@AdseroIP.com)>, Tara Damhoff <[TDamhoff@AdseroIP.com](mailto:TDamhoff@AdseroIP.com)>, Nokia309 <[Nokia309@alston.com](mailto:Nokia309@alston.com)>, Kline, Douglas J <[DKline@goodwinlaw.com](mailto:DKline@goodwinlaw.com)>, Ong, Andrew <[AOng@goodwinlaw.com](mailto:AOng@goodwinlaw.com)>  
**Subject:** RE: TQ Delta, LLC v. Commscope 2:21-cv-310-JRG / Request to Meet and Confer regarding Revised Docket Control and Discovery Order

Kent,

Nokia is available from 1:30-3 ET on Monday afternoon.

Thanks,

Katie Donald  
Associate  
**Alston & Bird LLP**  
404-881-4630  
[Katie.donald@alston.com](mailto:Katie.donald@alston.com)

---

**From:** Edward Chin <[echin@davisfirm.com](mailto:echin@davisfirm.com)>  
**Sent:** Tuesday, May 31, 2022 1:03 PM  
**To:** Kent Dallow <[KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)>  
**Cc:** Walsh, Rachel M. <[RWalsh@goodwinlaw.com](mailto:RWalsh@goodwinlaw.com)>; Donald, Katie <[Katie.Donald@alston.com](mailto:Katie.Donald@alston.com)>; Bo Davis <[bdavis@davisfirm.com](mailto:bdavis@davisfirm.com)>; Ken Chang <[Ken@AdseroIP.com](mailto:Ken@AdseroIP.com)>; Dan Young <[DYoung@AdseroIP.com](mailto:DYoung@AdseroIP.com)>; Tara Damhoff <[TDamhoff@AdseroIP.com](mailto:TDamhoff@AdseroIP.com)>; Nokia309 <[Nokia309@alston.com](mailto:Nokia309@alston.com)>; Kline, Douglas J <[DKline@goodwinlaw.com](mailto:DKline@goodwinlaw.com)>; Ong, Andrew <[AOng@goodwinlaw.com](mailto:AOng@goodwinlaw.com)>  
**Subject:** Re: TQ Delta, LLC v. Commscope 2:21-cv-310-JRG / Request to Meet and Confer regarding Revised Docket Control and Discovery Order

**EXTERNAL SENDER – Proceed with caution**

---

Kent,

Monday afternoon works best for TQ Delta.

**Ed Chin, Of Counsel**  
**The Davis Firm, P.C.**  
213 N. Fredonia St., Suite 230  
Longview, Texas 75601  
office: 903-230-9090  
[echin@davisfirm.com](mailto:echin@davisfirm.com)

On May 31, 2022, at 9:38 AM, Kent Dallow <[KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)> wrote:

Counsel,

Given TQ Delta's scheduling conflicts, please provide us with your availability for next Monday June 6.

Best,

Kent

---

Kent Dallow  
Counsel  
**Adsero IP**  
8210 Southpark Terrace, Littleton, CO 80120

**P** +1 303.268.0066 | **E** [KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)  
[www.AdseroIP.com](http://www.AdseroIP.com) | [my profile](#)

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---

**From:** Edward Chin <[echin@davisfirm.com](mailto:echin@davisfirm.com)>  
**Date:** Tuesday, May 31, 2022 at 8:37 AM  
**To:** Kent Dallow <[KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)>  
**Cc:** Walsh, Rachel M. <[RWalsh@goodwinlaw.com](mailto:RWalsh@goodwinlaw.com)>, Donald, Katie <[Katie.Donald@alston.com](mailto:Katie.Donald@alston.com)>, Bo Davis <[bdavis@davisfirm.com](mailto:bdavis@davisfirm.com)>, Ken Chang <[Ken@AdseroIP.com](mailto:Ken@AdseroIP.com)>, Dan Young <[DYoung@AdseroIP.com](mailto:DYoung@AdseroIP.com)>, Tara Damhoff <[TDamhoff@AdseroIP.com](mailto:TDamhoff@AdseroIP.com)>, Nokia309 <[Nokia309@alston.com](mailto:Nokia309@alston.com)>, Kline, Douglas J <[DKline@goodwinlaw.com](mailto:DKline@goodwinlaw.com)>, Ong, Andrew <[AOng@goodwinlaw.com](mailto:AOng@goodwinlaw.com)>  
**Subject:** Re: TQ Delta, LLC v. Commscope 2:21-cv-310-JRG / Request to Meet and Confer regarding Revised Docket Control and Discovery Order

Kent,

Due to the claim construction hearing and other conflicts this week, TQ Delta won't be available until next Monday.

**Ed Chin, Of Counsel**  
**The Davis Firm, P.C.**  
213 N. Fredonia St., Suite 230  
Longview, Texas 75601  
office: 903-230-9090  
[echin@davisfirm.com](mailto:echin@davisfirm.com)

On May 31, 2022, at 8:57 AM, Kent Dallow  
[KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com) wrote:

Ed,

Please let us know if TQ Delta is available today between 12:30 ET and 3 ET, otherwise, please let us know your availability for the rest of the week.

Best,

Kent

---  
Kent Dallow  
Counsel  
**Adsero IP**  
8210 Southpark Terrace, Littleton, CO 80120  
**P** +1 303.268.0066 | **E** [KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)  
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**From:** Kent Dallow <[KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)>  
**Date:** Thursday, May 26, 2022 at 8:48 PM  
**To:** Walsh, Rachel M. <[RWalsh@goodwinlaw.com](mailto:RWalsh@goodwinlaw.com)>,  
Donald, Katie <[Katie.Donald@alston.com](mailto:Katie.Donald@alston.com)>  
**Cc:** Bo Davis <[bdavis@davisfirm.com](mailto:bdavis@davisfirm.com)>, Ken Chang  
<[Ken@AdseroIP.com](mailto:Ken@AdseroIP.com)>, Dan Young  
<[DYoung@AdseroIP.com](mailto:DYoung@AdseroIP.com)>, Tara Damhoff  
<[TDamhoff@AdseroIP.com](mailto:TDamhoff@AdseroIP.com)>, Nokia309  
<[Nokia309@alston.com](mailto:Nokia309@alston.com)>, Edward Chin  
<[echin@davisfirm.com](mailto:echin@davisfirm.com)>, Kline, Douglas J  
<[DKline@goodwinlaw.com](mailto:DKline@goodwinlaw.com)>, Ong, Andrew  
<[AOng@goodwinlaw.com](mailto:AOng@goodwinlaw.com)>  
**Subject:** Re: TQ Delta, LLC v. Commscope 2:21-cv-310-JRG / Request to Meet and Confer regarding Revised Docket Control and Discovery Order

Great, thanks, Rachel and Katie.

Ed, please let us know when your team is available and we can lock down a time.

Best,

Kent

---

Kent Dallow  
Counsel  
**Adsero IP**  
8210 Southpark Terrace, Littleton, CO 80120  
**P** +1 303.268.0066 | **E** [KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)  
[www.AdseroIP.com](http://www.AdseroIP.com) | [my profile](#)

<image006.png>

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**From:** Walsh, Rachel M. <[RWalsh@goodwinlaw.com](mailto:RWalsh@goodwinlaw.com)>  
**Date:** Thursday, May 26, 2022 at 6:01 PM  
**To:** Donald, Katie <[Katie.Donald@alston.com](mailto:Katie.Donald@alston.com)>, Kent Dallow <[KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)>  
**Cc:** Bo Davis <[bdavis@davisfirm.com](mailto:bdavis@davisfirm.com)>, Ken Chang <[Ken@AdseroIP.com](mailto:Ken@AdseroIP.com)>, Dan Young <[DYoung@AdseroIP.com](mailto:DYoung@AdseroIP.com)>, Tara Damhoff <[TDamhoff@AdseroIP.com](mailto:TDamhoff@AdseroIP.com)>, Nokia309 <[Nokia309@alston.com](mailto:Nokia309@alston.com)>, Edward Chin <[echin@davisfirm.com](mailto:echin@davisfirm.com)>, Kline, Douglas J <[DKline@goodwinlaw.com](mailto:DKline@goodwinlaw.com)>, Ong, Andrew <[AOng@goodwinlaw.com](mailto:AOng@goodwinlaw.com)>  
**Subject:** RE: TQ Delta, LLC v. Commscope 2:21-cv-310-JRG / Request to Meet and Confer regarding Revised Docket Control and Discovery Order

Those times also work for Commscope.

Best,

Rachel

---

**From:** Donald, Katie <[Katie.Donald@alston.com](mailto:Katie.Donald@alston.com)>  
**Sent:** Wednesday, May 25, 2022 2:44 PM  
**To:** Kent Dallow <[KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)>  
**Cc:** Bo Davis <[bdavis@davisfirm.com](mailto:bdavis@davisfirm.com)>; Ken Chang <[Ken@AdseroIP.com](mailto:Ken@AdseroIP.com)>; Dan Young <[DYoung@AdseroIP.com](mailto:DYoung@AdseroIP.com)>; Tara Damhoff <[TDamhoff@AdseroIP.com](mailto:TDamhoff@AdseroIP.com)>; Nokia309 <[Nokia309@alston.com](mailto:Nokia309@alston.com)>; Edward Chin <[echin@davisfirm.com](mailto:echin@davisfirm.com)>; Kline, Douglas J <[DKline@goodwinlaw.com](mailto:DKline@goodwinlaw.com)>; Walsh, Rachel M. <[RWalsh@goodwinlaw.com](mailto:RWalsh@goodwinlaw.com)>; Ong, Andrew <[AOng@goodwinlaw.com](mailto:AOng@goodwinlaw.com)>  
**Subject:** RE: TQ Delta, LLC v. Commscope 2:21-cv-310-JRG / Request to Meet and Confer regarding Revised Docket Control and Discovery Order

\*\*\*EXTERNAL\*\*\*

Hi Kent,

We are available next Tuesday, May 31<sup>st</sup> between 12:30 and 3 ET. Please let us know if a time between that window works.

Thanks,

Katie Donald  
Associate  
**Alston & Bird LLP**  
404-881-4630  
[Katie.donald@alston.com](mailto:Katie.donald@alston.com)

---

**From:** Kent Dallow <[KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)>  
**Sent:** Wednesday, May 25, 2022 3:32 PM  
**To:** Donald, Katie <[Katie.Donald@alston.com](mailto:Katie.Donald@alston.com)>  
**Cc:** Bo Davis <[bdavis@davisfirm.com](mailto:bdavis@davisfirm.com)>; Ken Chang <[Ken@AdseroIP.com](mailto:Ken@AdseroIP.com)>; Dan Young <[DYoung@AdseroIP.com](mailto:DYoung@AdseroIP.com)>; Tara Damhoff <[TDamhoff@AdseroIP.com](mailto:TDamhoff@AdseroIP.com)>; Nokia309 <[Nokia309@alston.com](mailto:Nokia309@alston.com)>; Edward Chin <[echin@davisfirm.com](mailto:echin@davisfirm.com)>; Kline, Douglas J <[DKline@goodwinlaw.com](mailto:DKline@goodwinlaw.com)>; Walsh, Rachel M. <[RWalsh@goodwinlaw.com](mailto:RWalsh@goodwinlaw.com)>; Ong, Andrew <[AOng@goodwinlaw.com](mailto:AOng@goodwinlaw.com)>  
**Subject:** Re: TQ Delta, LLC v. Commscope 2:21-cv-310-JRG / Request to Meet and Confer regarding Revised Docket Control and Discovery Order

**EXTERNAL SENDER – Proceed with caution**

---

Counsel,

Please find attached our draft proposed revisions to the protective order, docket control order, and discovery order. Please let us know your availability next week to discuss and please circulate your proposals a few days in advance of the call if you have changed your positions.

Best,

Kent

---

Kent Dallow  
Counsel  
**Adsero IP**  
8210 Southpark Terrace, Littleton, CO 80120  
**P** +1 303.268.0066 | **E** [KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)  
[www.AdseroIP.com](http://www.AdseroIP.com) | [my profile](#)

<image001.png>

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---

**From:** Donald, Katie <[Katie.Donald@alston.com](mailto:Katie.Donald@alston.com)>  
**Date:** Thursday, May 19, 2022 at 1:48 PM  
**To:** Kent Dallow <[KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)>  
**Cc:** Bo Davis <[bdavis@davisfirm.com](mailto:bdavis@davisfirm.com)>, Ken Chang <[Ken@AdseroIP.com](mailto:Ken@AdseroIP.com)>, Dan Young <[DYoung@AdseroIP.com](mailto:DYoung@AdseroIP.com)>, Tara Damhoff <[TDamhoff@AdseroIP.com](mailto:TDamhoff@AdseroIP.com)>, Nokia309 <[Nokia309@alston.com](mailto:Nokia309@alston.com)>, Edward Chin <[echin@davisfirm.com](mailto:echin@davisfirm.com)>, Kline, Douglas J <[DKline@goodwinlaw.com](mailto:DKline@goodwinlaw.com)>, Walsh, Rachel M. <[RWalsh@goodwinlaw.com](mailto:RWalsh@goodwinlaw.com)>, Ong, Andrew <[AOng@goodwinlaw.com](mailto:AOng@goodwinlaw.com)>  
**Subject:** RE: TQ Delta, LLC v. Commscope 2:21-cv-310-JRG / Request to Meet and Confer regarding Revised Docket Control and Discovery Order

Kent,

We are not planning on submitting any proposal for the revised docket control and discovery order. If you would

like to circulate yours, we will review and let you know if we have any comments.

Sincerely,

Katie Donald  
Associate  
**Alston & Bird LLP**  
404-881-4630  
[Katie.donald@alston.com](mailto:Katie.donald@alston.com)

---

**From:** Kent Dallow <[KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)>  
**Sent:** Tuesday, May 17, 2022 5:12 PM  
**To:** Donald, Katie <[Katie.Donald@alston.com](mailto:Katie.Donald@alston.com)>  
**Cc:** Bo Davis <[bdavis@davisfirm.com](mailto:bdavis@davisfirm.com)>; Ken Chang <[Ken@AdseroIP.com](mailto:Ken@AdseroIP.com)>; Dan Young <[DYoung@AdseroIP.com](mailto:DYoung@AdseroIP.com)>; Tara Damhoff <[TDamhoff@AdseroIP.com](mailto:TDamhoff@AdseroIP.com)>; Nokia309 <[Nokia309@alston.com](mailto:Nokia309@alston.com)>; Edward Chin <[echin@davisfirm.com](mailto:echin@davisfirm.com)>; Kline, Douglas J <[DKline@goodwinlaw.com](mailto:DKline@goodwinlaw.com)>; Walsh, Rachel M. <[RWalsh@goodwinlaw.com](mailto:RWalsh@goodwinlaw.com)>; Ong, Andrew <[AOng@goodwinlaw.com](mailto:AOng@goodwinlaw.com)>  
**Subject:** Re: TQ Delta, LLC v. Commscope 2:21-cv-310-JRG / Request to Meet and Confer regarding Revised Docket Control and Discovery Order

**EXTERNAL SENDER – Proceed with caution**

---

Counsel,

Thank you for your position. Please provide us with your proposed drafts of the revised docket control order and discovery order.

Best,

Kent

---

Kent Dallow  
Counsel  
**Adsero IP**  
8210 Southpark Terrace, Littleton, CO 80120  
**P** +1 303.268.0066 | **E** [KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)  
[www.AdseroIP.com](http://www.AdseroIP.com) | [my profile](#)

<image002.png>

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---

**From:** Donald, Katie <[Katie.Donald@alston.com](mailto:Katie.Donald@alston.com)>  
**Date:** Tuesday, May 17, 2022 at 3:01 PM  
**To:** Kent Dallow <[KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)>  
**Cc:** Bo Davis <[bdavis@davisfirm.com](mailto:bdavis@davisfirm.com)>, Ken Chang <[Ken@AdseroIP.com](mailto:Ken@AdseroIP.com)>, Dan Young <[DYoung@AdseroIP.com](mailto:DYoung@AdseroIP.com)>, Tara Damhoff <[TDamhoff@AdseroIP.com](mailto:TDamhoff@AdseroIP.com)>, Nokia309 <[Nokia309@alston.com](mailto:Nokia309@alston.com)>, Edward Chin <[echin@davisfirm.com](mailto:echin@davisfirm.com)>, Kline, Douglas J <[DKline@goodwinlaw.com](mailto:DKline@goodwinlaw.com)>, Walsh, Rachel M. <[RWalsh@goodwinlaw.com](mailto:RWalsh@goodwinlaw.com)>, Ong, Andrew <[AOng@goodwinlaw.com](mailto:AOng@goodwinlaw.com)>  
**Subject:** RE: TQ Delta, LLC v. Commscope 2:21-cv-310-JRG / Request to Meet and Confer regarding Revised Docket Control and Discovery Order

You don't often get email from [katie.donald@alston.com](mailto:katie.donald@alston.com). [Learn why this is important](#)

I am writing to follow up on yesterday's meet and confer. Nokia takes no position regarding Broadcom's request to amend the schedule. Nokia, however, does oppose

Broadcom's proposed stipulation regarding discovery in Nokia's case.

Sincerely,

Katie Donald  
Associate  
**Alston & Bird LLP**  
404-881-4630  
[Katie.donald@alston.com](mailto:Katie.donald@alston.com)

---

**From:** Kent Dallow <[KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)>  
**Sent:** Wednesday, May 11, 2022 9:22 AM  
**To:** Ong, Andrew <[AOng@goodwinlaw.com](mailto:AOng@goodwinlaw.com)>; Subashi, Darlena <[Darlena.Subashi@alston.com](mailto:Darlena.Subashi@alston.com)>; Edward Chin <[echin@davisfirm.com](mailto:echin@davisfirm.com)>; Kline, Douglas J <[DKline@goodwinlaw.com](mailto:DKline@goodwinlaw.com)>; Walsh, Rachel M. <[RWalsh@goodwinlaw.com](mailto:RWalsh@goodwinlaw.com)>  
**Cc:** Bo Davis <[bdavis@davisfirm.com](mailto:bdavis@davisfirm.com)>; Ken Chang <[Ken@AdseroIP.com](mailto:Ken@AdseroIP.com)>; Dan Young <[DYoung@AdseroIP.com](mailto:DYoung@AdseroIP.com)>; Tara Damhoff <[TDamhoff@AdseroIP.com](mailto:TDamhoff@AdseroIP.com)>; Nokia309 <[Nokia309@alston.com](mailto:Nokia309@alston.com)>  
**Subject:** Re: TQ Delta, LLC v. Commscope 2:21-cv-310-JRG / Request to Meet and Confer regarding Revised Docket Control and Discovery Order

**EXTERNAL SENDER – Proceed with caution**

---

Andy, thank you for the information.

Counsel, please let us know your availability on Monday or Tuesday next week for our call.

Berst,

Kent

---  
Kent Dallow

Counsel

**Adsero IP**

8210 Southpark Terrace, Littleton, CO 80120

P +1 303.268.0066 | E [KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)

[www.AdseroIP.com](http://www.AdseroIP.com) | [my profile](#)

<image003.png>

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---

**From:** Ong, Andrew <[AOng@goodwinlaw.com](mailto:AOng@goodwinlaw.com)>

**Date:** Tuesday, May 10, 2022 at 4:38 PM

**To:** Kent Dallow <[KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)>, Subashi, Darlena <[Darlena.Subashi@alston.com](mailto:Darlena.Subashi@alston.com)>, Edward Chin <[echin@davisfirm.com](mailto:echin@davisfirm.com)>, Kline, Douglas J <[DKline@goodwinlaw.com](mailto:DKline@goodwinlaw.com)>, Walsh, Rachel M. <[RWalsh@goodwinlaw.com](mailto:RWalsh@goodwinlaw.com)>

**Cc:** Bo Davis <[bdavis@davisfirm.com](mailto:bdavis@davisfirm.com)>, Ken Chang <[Ken@AdseroIP.com](mailto:Ken@AdseroIP.com)>, Dan Young <[DYoung@AdseroIP.com](mailto:DYoung@AdseroIP.com)>, Tara Damhoff <[TDamhoff@AdseroIP.com](mailto:TDamhoff@AdseroIP.com)>, Nokia309 <[Nokia309@alston.com](mailto:Nokia309@alston.com)>

**Subject:** RE: TQ Delta, LLC v. Commscope 2:21-cv-310-JRG / Request to Meet and Confer regarding Revised Docket Control and Discovery Order

Hi Kent,

Friday does not work, as a few of us are traveling that day. Would it be possible to move the call to Monday or Tuesday? Either I or my colleague Rachel Walsh will be able to join then.

Thanks.

Andy

**From:** Kent Dallow <[KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)>  
**Sent:** Tuesday, May 10, 2022 2:42 PM  
**To:** Subashi, Darlena <[Darlena.Subashi@alston.com](mailto:Darlena.Subashi@alston.com)>;  
Edward Chin <[echin@davisfirm.com](mailto:echin@davisfirm.com)>; Kline, Douglas J  
<[DKline@goodwinlaw.com](mailto:DKline@goodwinlaw.com)>; Ong, Andrew  
<[AOng@goodwinlaw.com](mailto:AOng@goodwinlaw.com)>  
**Cc:** Bo Davis <[bdavis@davisfirm.com](mailto:bdavis@davisfirm.com)>; Ken Chang  
<[Ken@AdseroIP.com](mailto:Ken@AdseroIP.com)>; Dan Young  
<[DYoung@AdseroIP.com](mailto:DYoung@AdseroIP.com)>; Tara Damhoff  
<[TDamhoff@AdseroIP.com](mailto:TDamhoff@AdseroIP.com)>; Nokia309  
<[Nokia309@alston.com](mailto:Nokia309@alston.com)>  
**Subject:** Re: TQ Delta, LLC v. Commscope 2:21-cv-310-JRG / Request to Meet and Confer regarding Revised Docket Control and Discovery Order

\*\*\*EXTERNAL\*\*\*

Mr. Kline,

Can you please confirm whether 12:00 PM MT on Friday May 13 works for counsel for the Commscope and ARRIS Defendants?

Best,

Kent

---

Kent Dallow  
Counsel  
**Adsero IP**  
8210 Southpark Terrace, Littleton, CO 80120  
**P** +1 303.268.0066 | **E** [KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)  
[www.AdseroIP.com](http://www.AdseroIP.com) | [my profile](#)

<image004.png>

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---

**From:** Kent Dallow <[KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)>  
**Date:** Monday, May 9, 2022 at 9:58 AM  
**To:** Subashi, Darlena <[Darlena.Subashi@alston.com](mailto:Darlena.Subashi@alston.com)>, Edward Chin <[echin@davisfirm.com](mailto:echin@davisfirm.com)>, dkline@goodwinlaw.com <[dcline@goodwinlaw.com](mailto:dcline@goodwinlaw.com)>  
**Cc:** Bo Davis <[bdavis@davisfirm.com](mailto:bdavis@davisfirm.com)>, Ken Chang <[Ken@AdseroIP.com](mailto:Ken@AdseroIP.com)>, Dan Young <[DYoung@AdseroIP.com](mailto:DYoung@AdseroIP.com)>, Tara Damhoff <[TDamhoff@AdseroIP.com](mailto:TDamhoff@AdseroIP.com)>, Nokia309 <[Nokia309@alston.com](mailto:Nokia309@alston.com)>  
**Subject:** Re: TQ Delta, LLC v. Commscope 2:21-cv-310-JRG / Request to Meet and Confer regarding Revised Docket Control and Discovery Order

Counsel,

We write to follow up on the emails below.

Ms. Subashi and Mr. Chin, thank you for your availability; let's tentatively plan on 12:00 PM MT on Friday subject to the remaining Defendants' confirmation.

Mr. Kline, please confirm whether 12:00 PM MT on Friday May 13 works for counsel for the Commscope and ARRIS Defendants.

Best,

Kent

---

Kent Dallow  
Counsel  
**Adsero IP**  
8210 Southpark Terrace, Littleton, CO 80120  
P +1 303.268.0066 | E [KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)  
[www.AdseroIP.com](http://www.AdseroIP.com) | [my profile](#)

<image005.png>

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**From:** Subashi, Darlena  
[<Darlena.Subashi@alston.com>](mailto:Darlena.Subashi@alston.com)  
**Date:** Monday, May 9, 2022 at 8:53 AM  
**To:** Edward Chin <[echin@davisfirm.com](mailto:echin@davisfirm.com)>, Kent Dallow <[KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)>  
**Cc:** [dkline@goodwinlaw.com](mailto:dkline@goodwinlaw.com) <[dkline@goodwinlaw.com](mailto:dkline@goodwinlaw.com)>, Bo Davis <[bdavis@davisfirm.com](mailto:bdavis@davisfirm.com)>, Ken Chang <[Ken@AdseroIP.com](mailto:Ken@AdseroIP.com)>, Dan Young <[DYoung@AdseroIP.com](mailto:DYoung@AdseroIP.com)>, Tara Damhoff <[TDamhoff@AdseroIP.com](mailto:TDamhoff@AdseroIP.com)>, Nokia309 <[Nokia309@alston.com](mailto:Nokia309@alston.com)>  
**Subject:** RE: TQ Delta, LLC v. Commscope 2:21-cv-310-JRG / Request to Meet and Confer regarding Revised Docket Control and Discovery Order

You don't often get email from [darlena.subashi@alston.com](mailto:darlena.subashi@alston.com). [Learn why this is important](#)

Kent,

Counsel for Nokia are available on Thursday except for 2:30-3:30 pm ET and on Friday except for 3:00-4:00 pm ET.

Best,  
Darlena

Darlena Subashi (she/her)  
**ALSTON & BIRD**  
90 Park Avenue  
New York, NY 10016  
Direct: 212-210-1277  
Mobile: 702-290-8318  
[Darlena.Subashi@alston.com](mailto:Darlena.Subashi@alston.com)

---

**From:** Edward Chin <[echin@davisfirm.com](mailto:echin@davisfirm.com)>  
**Sent:** Monday, May 9, 2022 10:50 AM  
**To:** Kent Dallow <[KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)>  
**Cc:** Subashi, Darlena <[Darlena.Subashi@alston.com](mailto:Darlena.Subashi@alston.com)>; [dkline@goodwinlaw.com](mailto:dkline@goodwinlaw.com); Bo Davis <[bdavis@davisfirm.com](mailto:bdavis@davisfirm.com)>; Ken Chang <[Ken@AdseroIP.com](mailto:Ken@AdseroIP.com)>; Dan Young <[DYoung@AdseroIP.com](mailto:DYoung@AdseroIP.com)>; Tara Damhoff <[TDamhoff@AdseroIP.com](mailto:TDamhoff@AdseroIP.com)>; Nokia309 <[Nokia309@alston.com](mailto:Nokia309@alston.com)>  
**Subject:** Re: TQ Delta, LLC v. Commscope 2:21-cv-310-JRG / Request to Meet and Confer regarding Revised Docket Control and Discovery Order

**EXTERNAL SENDER – Proceed with caution**

---

Kent,

TQ Delta's counsel is generally available this week.

**Ed Chin, Of Counsel**  
**The Davis Firm, P.C.**  
213 N. Fredonia St., Suite 230  
Longview, Texas 75601  
office: 903-230-9090  
[echin@davisfirm.com](mailto:echin@davisfirm.com)

On May 6, 2022, at 2:16 PM, Kent Dallow  
[KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com) wrote:

Counsel,

As we did not receive a response from all parties, please let us know your availability next week to have a meet and confer to discuss submitting revised docket control and discovery orders.

Best,

Kent

---  
Kent Dallow  
Counsel  
**Adsero IP**  
8210 Southpark Terrace, Littleton, CO  
80120  
**P** +1 303.268.0066 | **E**  
[KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)  
[www.AdseroIP.com](http://www.AdseroIP.com) | [my profile](#)

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---

**From:** Subashi, Darlena  
[<Darlena.Subashi@alston.com>](mailto:Darlena.Subashi@alston.com)  
**Date:** Tuesday, May 3, 2022 at 8:08 AM  
**To:** Kent Dallow  
[KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com), Edward Chin  
[echin@davisfirm.com](mailto:echin@davisfirm.com), [dkline@goodwinlaw.com](mailto:dkline@goodwinlaw.com) <[dkline@goodwinlaw.com](mailto:dkline@goodwinlaw.com)>, Bo Davis <[bdavis@davisfirm.com](mailto:bdavis@davisfirm.com)>, Ken Chang <[Ken@AdseroIP.com](mailto:Ken@AdseroIP.com)>, Dan Young <[DYoung@AdseroIP.com](mailto:DYoung@AdseroIP.com)>, Tara Damhoff <[TDamhoff@AdseroIP.com](mailto:TDamhoff@AdseroIP.com)>  
**Cc:** Nokia309 <[Nokia309@alston.com](mailto:Nokia309@alston.com)>  
**Subject:** RE: TQ Delta, LLC v. Commscope  
2:21-cv-310-JRG / Request to Meet and Confer regarding Revised Docket Control and Discovery Order

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from [darlena.subashi@alston.com](mailto:darlena.subashi@alston.com). [Learn why  
this is important](#)

Counsel,

We can be available Thursday afternoon ET.  
Moving forward, please copy our reflector  
([nokia309@alston.com](mailto:nokia309@alston.com)) on any case-related correspondence.

Best,  
Darlena

Darlena Subashi (she/her)  
**ALSTON & BIRD**  
90 Park Avenue  
New York, NY 10016  
Direct: 212-210-1277  
Mobile: 702-290-8318  
[Darlena.Subashi@alston.com](mailto:Darlena.Subashi@alston.com)

**From:** Kent Dallow  
[<KDallow@adseroip.com>](mailto:KDallow@adseroip.com)  
**Date:** April 29, 2022 at  
1:02:57 PM CDT  
**To:** [echin@bdavisfirm.com](mailto:echin@bdavisfirm.com),  
"Stevens, Scott"  
[<Scott.Stevens@alston.com](mailto:Scott.Stevens@alston.com)  
>, [dkline@goodwinlaw.com](mailto:dkline@goodwinlaw.com),  
Bo Davis  
[<bdavis@davisfirm.com>](mailto:bdavis@davisfirm.com)  
**Cc:** Ken Chang  
[<Ken@adseroip.com>](mailto:Ken@adseroip.com), Dan  
Young  
[<DYoung@adseroip.com>](mailto:DYoung@adseroip.com),  
Tara Damhoff  
[<TDamhoff@adseroip.com>](mailto:TDamhoff@adseroip.com)  
**Subject:** TQ Delta, LLC v.  
**Commscope 2:21-cv-310-JRG / Request to Meet and Confer regarding Revised Docket Control and Discovery Order**

**EXTERNAL SENDER – Proceed with caution**

Counsel,

We represent Broadcom in the above captioned case. Please let us know your availability next week to have a meet and confer to discuss submitting revised docket control and discovery orders.

Best,

Kent

---

Kent Dallow  
Counsel  
**Adsero IP**  
8210 Southpark Terrace,  
Littleton, CO 80120  
[P +1 303.268.0066](#) | [E](#)  
[KDallow@AdseroIP.com](mailto:KDallow@AdseroIP.com)  
[www.AdseroIP.com](http://www.AdseroIP.com) | [my profile](#)

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